

AMERICAN ACADEMY OF CHILD & ADOLESCENT PSYCHIATRY

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 18, 1998

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William Kennard, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20544

Regarding: CS Docket NO. 97-55, CS Docket NO. 97-321, ET Docket 97-206

Dear Chairman Kennard:

The American Academy of Child and Adolescent Psychiatry (AACAP) and the American Psychiatric Association (APA) appreciate this opportunity to participate in the Federal Communication Commission's (FCC) review of broadcast ownership rules as specified in the Telecommunications Act of 1996, specifically the order that found acceptable the video programming rating system currently in voluntary use and established technical requirements for consumer electronic equipment to enable blocking of video programming.

The AACAP is a national, professional association of more than 6,300 child and adolescent psychiatrists who have completed training in general and child and adolescent psychiatry. Similarly, the APA is a national medical specialty society representing more than 42,000 psychiatric physicians. As the two major medical psychiatric organizations with expertise in understanding development and behavior, our joint concerns about the revised rating system and the accompanying technical requirements are directed at the protection, and well-being of America's children and adolescents.

The AACAP and APA submit the following recommendations regarding the March 12, FCC actions:

Regarding the video programming rating system currently in voluntary use:

We support the adoption of the expanded, content-based television guidelines that include 1) specific icons/symbols for assessing the suitability for viewing by children, 2) ratings for advising parents about the type of material in the

programming, and 3) the extension of the time of the symbols and ratings on the screen to 15 seconds, which allows a parent or child to understand and better process the information. While we support this video programming rating system, we remain concerned that rating icons and blocking codes are chosen by raters without explicit criteria and objective methods, and we urge the development and use of explicit criteria and methods to reduce inconsistency and bias.

Regarding technical requirements for consumer electronic equipment to enable blocking of video programming:

The AACAP and APA have not wavered from our previously submitted recommendation that the technical opportunity should be preserved for parents to have equal access to other rating systems that may be developed and introduced as alternatives to the industry proposal. This access will be available only if the v-chip allows the inclusion of alternative rating systems in addition to the currently accepted system. We recommend that the Commission reconsider the March 12 action, and adopt technical requirements mandating a v-chip design and associated technology that allow for the inclusion of alternative rating systems. Such a requirement for "open architecture" in the system would encourage the development of advanced technology rather than relying on a static system that is susceptible to commercially motivated and competing networks. The guarantee of "open architecture" for blocking programming reflects traditional American values and principles of free speech.

We urge the Commission to consider these recommendations regarding the FCC's March 12 adoption of the industry video programming rating system and the technical requirements to enable blocking of video programming: CS Docket NO. 97-55, CS Docket NO. 97-321, ET Docket 97-206.

Sincerely,



David B. Pruitt, M.D.
President, AACAP



Herbert S. Sacks, M.D.
President, APA